

REMARKS

Claims 2-11 and 13-22 are pending. Claim 2 has been amended in the present response, and claim 3 has been amended to maintain consistency with base claim 2.

The undersigned attorney wishes to thank Examiner Jackson for her time on October 26, 2007, to discuss the present Office Action with applicant's representative, Michelle Macartney. At that time, the Examiner agreed to conduct a post-RCE telephone conference with the applicant's representative prior to issuance of any future Office Action. Applicant's representative will be contacting Examiner Jackson to schedule such an interview within a week after filing the present amendment and RCE.

In the May 2, 2007 Office Action, claims 2-11 and 13-22 were rejected under 35 U.S.C. § 102(b) over Chong (U.S. Patent No. 5,535,120). Claims 2-5 and 13-16 were alternately rejected under 35 U.S.C. § 102(e) over Homan (U.S. Patent No. 6,233,317). Applicant respectfully traverses these rejections.

Chong generally describes a machine translation system that can be used to translate input text in a source language to output text in a target language. One way that Chong implements this machine translation system is to create, maintain, and utilize various language and sublanguage dictionaries that facilitate the machine translation of such text. Thus, unlike applicant's claims, Chong is focused on translating **existing** communications, while applicant's techniques relate to generating new electronic mail messages (as opposed to translating currently existing electronic mail messages). Accordingly, Chong does not disclose the subject matter of applicant's claims.

For example, the method of claim 2 includes "generating a set of language-customized electronic mail messages containing content associated with marketing research, wherein at least a first one of the electronic mail messages is customized for a first recipient having a first language preference, wherein at least a second one of the

electronic mail messages is customized for a second recipient having a second language preference." As recited in claim 2, the generation of each email in the set includes: "identifying, as part of an electronic mail generation system, a preferred language of an electronic mail recipient; writing header information to an electronic mail message based on the identified preferred language; determining, based on the identified preferred language, a language-appropriate version of the content associated with the marketing event or marketing research event; and writing a body to the electronic mail message, wherein the body includes the determined language-appropriate version of the content associated with the marketing research."

Thus, the method of claim 2 does not involve the activity of translating text input (as described in Chong). Rather, applicant's claimed technique, by customizing the email at the time it is initially generated (rather than sometime after the fact), actually circumvents the need for subsequent translation, such as the type of translation described in Chong.

Furthermore, although Chong may describe various "correspondence types," including a correspondence type related to "financial/market reports," among others, the mere mention of the term "market" in the context of financial/market reports is not enough to support anticipation of applicant's claims which recite, for example, "language-customized electronic mail messages containing content associated with marketing research." (See, e.g., claim 2.) Content associated with marketing research is not the same thing as a financial/market report. For example, marketing research, as discussed in the applicant's specification, may include activities to gather information from participants (e.g., soliciting panelists in conducting a study related to marketing), as opposed to merely reporting information out. (See e.g., Specification at page 13.) Moreover, Chong (1) does not specifically disclose generating a new email containing content related to market research (e.g., claim 2), (2) does not describe an electronic mail generation system that is a part of a market research system (e.g., claim 6 and claim 17), and (3) does not mention generating an email "automatically in response to an event of the market research system" (e.g., claim 7 and claim 18).

Chong also fails to disclose subject matter contained in applicant's dependent claims. For example, while Chong may describe setting up sublanguage dictionaries that correspond to "socially-determined usages or particular contexts in which certain communications take place," and while Chong may suggest that, once such sublanguage dictionaries are set up, they can be accessed "according to factors identified in the cover page or header for a[n incoming] communication, e.g., status or sex indicative titles of the sender and recipient, positions in their respective companies, locations of the sender and recipient, etc.," this is not the same as applicant's claimed action of "determining a culturally appropriate salutation for the recipient based on the preferred language" (see e.g., claims 10, 11 and 21). More specifically, neither the creation/use of language sublanguage dictionaries nor the consideration of factors from the cover page or header of an incoming communication is the same as determining a culturally appropriate salutation for a newly generated email recipient based on a preferred language.

For at least the above reasons, the rejection of claims 2-11 and 13-22 over Chong should be withdrawn.

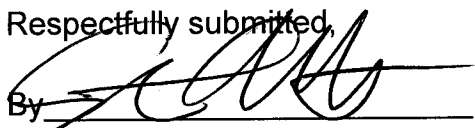
Homan also fails to disclose applicant's claimed subject matter. Homan describes providing notification emails to users of a telecommunications system. More specifically, as shown, for example, in Figure 3, Homan's system generates a notification email in response to a user receiving a FAX or voice message, which has been stored in the system and is awaiting the user. To accommodate users who speak different languages, Homan describes generating the text of such a notification email using a language specified by the user. Thus, Homan allows users to specify a language preference for the notification messages they will receive. Homan does not, however, describe generating sets of emails, let alone "generating a set of language-customized electronic mail messages containing content associated with marketing research, wherein at least a first one of the electronic mail messages is customized for a first recipient having a first language preference, wherein at least a second one of the electronic mail messages is customized for a second recipient having a second language preference."

Also, while Homan goes into detail, for example, at col. 5 line 2 to co. 6 line 24, describing various database fields that allow the invention in Homan to be implemented, Homan fails to describe any sort of process or technique for "writing header information to an electronic mail message based on the identified preferred language," as claimed by applicant. While it can be assumed that the emails in Homan do involve generating some sort of header, it is not apparent from Homan that the information in such headers is based on a language preference, as recited, for example, in applicant's claim 2, 6, 13, and 17.

For at least the above reasons, the rejection of claims 2-5 and 13-16 over Homan should be withdrawn.

The applicant respectfully requests that the Examiner reconsider the pending claims in view of the amendments and remarks set forth above.

Dated: NOV 2, 2007

Respectfully submitted,

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